



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ALC/LHE/SME
F. #2016R00505

271 Cadman Plaza East
Brooklyn, New York 11201

July 6, 2017

By ECF, Federal Express and Email

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Re: United States v. Mark Nordlicht, et al.
Criminal Docket No. 16-640 (DLI)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017, April 3, 2017, April 12, 2017, April 26, 2017, May 5, 2017, May 11, 2017, May 26, 2017, June 16, 2017, June 20, 2017 and July 3, 2017. The government again requests reciprocal discovery from the defendants.

Defense Counsel

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Contained on the enclosed compact disc are the following:

- Electronic copies of hard copy materials recovered through the search executed at the offices of Platinum Partners on June 22, 2016, which were seized from an office associated with the defendant Joseph SanFilippo: EDNY-PP-HC-00061245 – EDNY-PP-HC-00094730.
- Bank records for several accounts (some of which may be duplicative of bank records previously produced to you by the government):
 - EDNY-PP-BR-000327742 – EDNY-PP-BR-000327743;
 - EDNY-PP-BR-000327744 – EDNY-PP-BR-000329272.
- Electronic copies of hard copy materials that were recovered through a search conducted at the offices of Beechwood and the home office of Murray Huberfeld on June 8, 2016, pursuant to search warrants issued by the United States District Court for the Southern District of New York in connection with the United States Attorney's Office for the Southern District of New York's separate investigation:
 - Beechwood Offices: SDNY-PP-BW-000000001 – SDNY-PP-BW-000001840;
 - Huberfeld Home Office: SDNY-PP-HF-000000001 – SDNY-PP-HF-000002312;

The search warrants and supporting affidavits are included with this production at SDNY-SW-000000001 – SDNY-SW-00000134.

- A letter written by the defendant Jeffrey Shulse: JS 000000001 – JS 000000006.

Very truly yours,

BRIDGET M. ROHDE
Acting United States Attorney
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By: _____/s/
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cc: Clerk of the Court (DLI) (by ECF)